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September 19, 2014

Via ECF

Hon. Renee Marie Bumb, U.S.D.J.
United States District Court, District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: Zieger v. J.P. Morgan Chase Bank, N.A., et al.
Civil Action No.: 1:14-cv-02110-RMB-AMD

Dear Judge Bumb:

This firm represents Defendants, JPMorgan Chase Bank, National Association (incorrectly plead as “J. P. Morgan Chase Bank, N.A.” and “Chase Home Finance, LLC”), MERSCORP Holdings, Inc., Mortgage Electronic Registration Systems, Inc. (incorrectly plead as “MERSCorp, Inc. (MERS, Inc.)”) and Federal National Mortgage Association (plead as “Fannie Mae”) (collectively, the “Institutional Defendants”). On June 6, 2014, the Institutional Defendants filed a motion to dismiss the complaint filed by plaintiffs Dawn M. Zieger and John F. Zieger (collectively, the “Plaintiffs”). The motion to dismiss (the “Institutional Defendants’ Motion”) is currently unopposed. For the reasons that follow, the Institutional Defendants respectfully request that the Institutional Defendants’ Motion be considered by the Court unopposed.

The Institutional Defendants’ Motion was originally returnable on July 7, 2014. On July 3, 2014, Plaintiffs wrote the Court requesting an extension of time through September 10, 2014 for them to submit an opposition to the Institutional Defendants’ Motion, on the basis that they were *pro se* plaintiffs without adequate resources and needed the additional time to put together an opposition. (Docket Entry No. 15). On July 8, 2014, the Court granted the extension request and ordered that Plaintiffs could submit an opposition through August 15, 2014. (Docket Entry No. 16). On August 14, 2014, the Plaintiffs wrote the Court again requesting an additional extension of time through September 15, 2014 for them to submit an opposition to the Institutional Defendants’ Motion, this time providing no explanation other than they “need more time to properly respond.” (Docket Entry No. 17). On August 15, 2014, the Court granted the second extension request and ordered that the Plaintiffs could submit an opposition through September 15, 2014. (Docket Entry No. 18).

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New Jersey Managing Attorneys: Richard P. Haber, Esq. | Anthony J. Risalvato, Esq.

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As of this date, the Plaintiffs have neither submitted opposition to the Institutional Defendants' Motion nor requested an additional extension of time. Accordingly, the Institutional Defendants respectfully request that the Court now consider the Institutional Defendants' Motion as unopposed.

Respectfully yours,
Buckley Madole, P.C.

By: /s/ Richard P. Haber
Richard P. Haber, Esq.

cc: Dawn M. Zieger, *pro se*
John F. Zieger, *pro se*
Edward W. Kirn, III, Esq.
Jeanette J. O'Donnell, Esq.

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